1 JAN DAVID KAROWSKY 2 Attorney at Law A Professional Corporation California State Bar Number 53854 3 716 19<sup>th</sup> Street, Suite 100 4 Sacramento, CA 95811-1767 KarowskyLaw@sbcglobal.net (916) 447-1134 (916) 448-0265 (Fax) 6 Attorney for Defendant 7 Christopher King 8 UNITED STATES DISTRICT COURT 9 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA 10 11 United States of America, Case No. 2:24-cr-00120-DC 12 Plaintiff, 13 STIPULATION TO CONTINUE STATUS VS. CONFERENCE AND [PROPOSED] 14 **ORDER** Christopher King, 15 Date: November 21, 2025 Defendant Time: 9:30 a.m. 16 **Court: Hon. Dena Coggins** 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective 21 counsel, Assistant United States Attorney Heiko Coppola, counsel for plaintiff, and Jan David 22 Karowsky, counsel for defendant Christopher King, that the status conference scheduled for 23 November 21, 2025 at 9:30 a.m., be continued to January 16, 2026 at 9:30 a.m. 24 The defense has now completed its in-depth social history of Mr. King; prepared a 25 lengthy summary and presentation; and has just submitted it to AUSA Coppola for his review,

evaluation, and consideration. Both sides now need more time for the review of selected portions of discovery and additional legal research in light of the new reports.

With the holidays rapidly approaching and a two week pre-planned and pre-paid vacation in December by defense attorney Jan Karowsky, both sides agree more time is necessary for the stated relevant reasons.

Counsel for the defendant believes that failure to grant the above-requested continuance would deny the defendant the reasonable time necessary for effective preparation and representation, taking into account the exercise of due diligence.

The government does not object to the continuance.

The continuance is not based on the congestion of the Court.

Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 21, 2025 to January 16, 2026, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Accordingly, the parties request that the status conference in this matter be reset to January 16, 2026 at 9:30 a.m. The parties agree that the ends of justice served by resetting the status conference date outweigh the best interest of the public and the defendant in a speedy trial.

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1	Dated: November 10, 2025	Respectfully submitted,
2		ERIC GRANT United States Attorney
3		
4		/s/ HEIKO COPPOLA
5		by HEIKO COPPOLA
6		Assistant United States Attorney
7	DATED: November 10, 2025	JAN DAVID KAROWSKY Attorney at Law
8		A Professional Corporation
9		/s/ Jan David Karowsky
10		by
11		JAN DAVID KAROWSKY Attorney for Defendant
12		Christopher King
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## <u>ORDER</u>

The court, having received, read and considered the parties' stipulation filed on November 10, 2025, and good cause appearing therefrom, APPROVES the parties' stipulation. Accordingly, the Status Conference scheduled for November 21, 2025, is VACATED and RESET for January 16, 2026 at 9:30 a.m. in Courtroom 10 before the Honorable Dena M. Coggins. The time period between November 21, 2025 and January 16, 2026, inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C.§ 3161(h)(7)(A), and B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: **November 14, 2025** 

Dena Coggins

United States District Judge